

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JORGE VALDES, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CENTURY 21 REAL ESTATE LLC,

Defendants.

Civil Action No. 2:19-CV-05411

****ELECTRONICALLY FILED ****

NOTICE OF MOTION

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE, that on Monday, June 3, 2019, at 9:00 a.m. or as soon thereafter as counsel may be heard, defendant Century 21 Real Estate LLC will move before the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, in the above matter for an Order dismissing the Amended Complaint in its entirety.

PLEASE TAKE FURTHER NOTICE, that this motion is being filed in accordance with the procedures set forth in L.Civ.R. 7.1.

PLEASE TAKE FURTHER NOTICE, that in support of the within motion Century 21 shall rely upon the Memorandum of Law and the Declaration of Ronald A. Giller, Esq., with exhibits, submitted herewith.

PLEASE TAKE FURTHER NOTICE, that oral argument is respectfully requested if any opposition is submitted.

PLEASE TAKE FURTHER NOTICE, that a proposed form of Order is submitted herewith.

DATED: April 30, 2019

GORDON & REES LLP

/s/ Ronald A. Giller

/s/ Jennifer A. Guidea

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Attorneys for Defendant

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